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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
11

12 TAMIM ABDULFARID,
13 Plaintiff,
14 v.

15 JEFFERSON B. SESSION, U.S. Attorney General;
16 ELAINE DUKE, Acting Secretary of Department
of Homeland Security; ROBERT M. COWAN,
17 Director of the National Benefit Center, U.S.
Citizenship and Immigration Services,
18 Defendants.
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) Case No. 17-cv-04496 KAW
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) **STIPULATION TO EXTEND TIME TO**
) **RESPOND TO COMPLAINT AND**
) **[PROPOSED] ORDER**

1 Pursuant to Civil Local Rule 7-12, the parties, Defendants Jefferson B. Sessions, U.S. Attorney
2 General; Elaine Duke, Acting Secretary of Department of Homeland Security, and Robert M. Cowan,
3 Director of the National Benefit Center, U.S. Citizenship & Immigration Services (“USCIS”),
4 (collectively, “Defendants”), and Plaintiff Tamim Abdulfarid, by and through their respective counsel,
5 stipulate to extend the time for Defendants to respond to Plaintiff’s complaint. The parties state as
6 follows:

7 1. On August 7, 2017, Plaintiff filed his complaint in this immigration case seeking relief
8 under the Administrative Procedure Act, 5 U.S.C. § 701 *et seq.*;

9 2. On August 17, 2017, the U.S. Attorney’s Office received by certified mail a copy of the
10 summons and the complaint, making October 17, 2016, the deadline for Defendants to answer or
11 otherwise respond to the complaint;

12 3. On or about October, 2 2016, Plaintiff was issued a Notice to Appear by the Department
13 of Homeland Security;

14 4. Accordingly, the parties will attempt to negotiate a stipulated dismissal of the instant
15 case;

16 5. In light of the anticipated stipulated dismissal of this case, the parties have agreed to
17 extend the time for Defendants to respond to Plaintiff’s complaint from the current deadline of October
18 17, 2017, up to and including November 7, 2017;

19 6. No prior extensions of time have been requested or granted;

20 7. This change will not alter the date of any other event or deadline already fixed by Court
21 order.

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1 THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendants that
2 Defendants will have until November 7, 2017 to respond to Plaintiff's complaint.

3 **SO STIPULATED.**

4 Dated: October 16, 2017

Respectfully submitted,

5 BRIAN J. STRETCH
6 United States Attorney

7 /s/ Julie Bibb Davis
8 Julie Bibb Davis
9 Assistant United States Attorney

Counsel for Defendants

10 Dated: October 16, 2017

/s/ Wahida Noorzad
11 Wahida Noorzad
12 39111 Paseo Padre Parkway, Suite 2017
13 Fremont, California 94538

Counsel for Plaintiff

14 **ECF ATTESTATION**

15 In accordance with Civil Local Rule 5(i)(3), I, Julie Bibb Davis, attest that I have obtained concurrence
16 in the filing of this document from the other signatory listed here.

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18 ~~**[PROPOSED]**~~ **ORDER**

19 PURSUANT TO STIPULATION, IT IS SO ORDERED. Defendants are to respond to Plaintiff's
20 complaint by November 7, 2017.

21
22 DATED: 10/13/17

Kandis Westmore
23 Hon. Kandis A. Westmore
24 United States Magistrate Judge
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